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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107

SUBJECT: Request For A Ceiling Increase/
12-Month Exemption For The
Deardorff Drive Site
Etters, York County, Pennsylvania

DATE: APR 11 1988

FROM: James M. Seitz *[Signature]*
Regional Administrator (3RA00)

TO: Dr. J. Winston Porter, Assistant Administrator
Solid Waste and Emergency Response (WH-562A)

ISSUE

The attached CERCLA Funding Request pertains to the
Deardorff Drive Site in Etters, York County, Pennsylvania.

Removal operations are necessary to eliminate the threat to
public health and the environment posed by the contamination of
local ground water with trichloroethene (TCE) that exceeds one-
half of the lifetime drinking water equivalent level (DWEL).

Pursuant to the Delegation of Authority 14-1-A (9/13/87),
amended by Section 104 (e) of the Superfund Amendments and
Reauthorization Act (SARA) of 1986, which authorized the Regional
Administrator to approve CERCLA Removal Actions with a total cost
of less than \$2,000,000 and approve exemptions to the one year
limit, I have approved \$355,000 of which \$282,000 is for
extramural costs to control and stabilize this site and an
exemption to the 12-month statutory limit.

Attachments

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SUBJECT: Request For A Ceiling Increase/
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Deardorff Drive Site
Etters, York County, Pennsylvania
FROM: Charles J. Dispoto, Jr., On-Scene Coordinator
Removal Response Section (3HW25)

DATE: APR 11 1988

TO: James M. Seif
Regional Administrator (3RA00)
THRU: Stephen R. Wassersug
Hazardous Waste Management Division (3HW00)

I. ISSUE

This is a request for additional funding and an exemption from the 12 month limit to continue removal operations at the Deardorff Drive Site, Etters, York County, PA. Additional funds are necessary to continue the maintenance of carbon filtration systems and supplying of bottled water to eight (8) private residences with wells contaminated with trichloroethene (TCE), an industrial solvent. A ceiling increase of \$305,000 for a new total of \$355,000 is being requested to continue removal actions at the Deardorff Drive Site.

II. BACKGROUND

A. Incident/Response History

Newberry Township (population estimated at 3016) is located in York County, approximately 190 miles west of Philadelphia, Pennsylvania.

In response to citizen complaints concerning water quality in the area, tap water samples were taken by the Pennsylvania Department Of Environmental Resources (PADER) in September, 1986. Results revealed levels of trichloroethene (TCE) in tap water samples. Elevated TCE levels (greater than 5ppb) were found in six (6) homes, and in four (4) of these homes, TCE concentrations exceeded the Drinking Water Equivalent Level (DWEL). All residences in this area use private wells for drinking water.

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EPA/TAT reassessed the area in February, 1987 following a PADER request for assistance and issuance of advisories to local residents regarding water usage. In these advisories, PADER recommended using bottled water, boiling the water before use or installing carbon filters where TCE concentrations exceeded 45 ppb, and to discontinue drinking untreated water where TCE concentrations exceeded 100 ppb.

Results from the EPA/TAT site assessment identified eight (8) residential wells with concentrations of TCE above 5 ppb. Of these eight residential wells, four (4) had TCE concentrations above 260 ppb. (In response to these results, former OSC Province initiated an immediate removal action on 2/13/87 under the Delegation of Authority 14-1-A and used CERCLA funds at this site to provide bottled water and carbon filters to the affected residences.

Actions taken to date include the installation of one carbon filtration system and the maintenance of three existing systems. Four (4) additional homes have also been provided with bottled drinking water on a regular basis. This site is not scheduled to be scored for inclusion on the NPL.

B. Site Conditions

Presently, at least four residences in the area are known to have drinking water contamination with at least 260 ppb of TCE, and another four with contamination greater than 5 ppb. The Agency for Toxic Substances And Disease Registry (ATSDR) has previously recommended prevention of long-term use of potable water which has TCE concentrations equal to or greater than 130 ppb. Trichloroethene (TCE) is a hazardous substance as per Section 307 (A) of the Federal Water Pollution Control Act and Section 101 (14) of CERCLA. As a suspected carcinogen, this substance is believed to present an excess cancer risk to humans. The two primary routes of exposure for this volatile organic compound are through ingestion and inhalation.

At this time, the site remains stable. Sampling takes place at regular intervals to ensure the integrity of the carbon filtration systems, as well as to monitor groundwater concentrations of those homes in close proximity to the affected residences. Although the extent of contamination has been preliminarily defined, additional information is needed concerning the subsurface hydrology of the site, where, under certain conditions, the contaminant plume may change and spread.

This ceiling increase will be used to maintain the existing carbon filter systems and to continue the sampling program for an additional year.

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As assistance from other agencies is not readily available, it is necessary for EPA to continue the removal actions taken to date which have reduced the public health threat to local residences. The OSC has received a site options analysis from the Technical Assistance Team (TAT) identifying several combinations of waterline installation and/or pump and treat filtration systems. Based on the proximity of the closest operating water supplier (7 miles), and the present limitation on available removal funds in the Region, the cost for implementing this particular option is not currently feasible. It has been estimated that a pump and treat method of reducing groundwater contamination would possibly take decades to accomplish and result in years of operation and maintenance of the system.

It should be noted that the EPA/ERT is performing a hydrogeological investigation at the nearby Ridge Rd. Groundwater Site (also in Etters, PA.) and feels that much of the data being generated also pertains to the Deardorff Drive Site. During the next year the OSC will review the financial and technical feasibility of all options available as permanent solutions that take into account both sites simultaneously.

III. CRITERIA FOR EXEMPTION FROM STATUTORY LIMITS

Conditions at the Deardorff Drive Site meet the exemption criteria in CERCLA 104 (C), as amended by SARA as follows:

A. There is an immediate risk to public health, welfare or the environment.

Currently eight residences have wells with TCE concentrations greater than 5 ppb. Four of the eight residences have TCE concentrations that exceed the DWEL. TCE is a hazardous substance and is a suspected human carcinogen. The residences use the wells for all water supply uses within the homes.

B. Continued response actions are immediately required to prevent, limit or mitigate an emergency.

Response actions at the Deardorff Drive Site must extend beyond twelve months to continue supplying bottled water and maintaining the carbon filters. If an exemption to the twelve month statutory limit is not granted, residents will be forced to drink and use water contaminated with TCE.

C. Assistance will not otherwise be provided on a timely basis.

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As of this date, no potential responsible parties have been identified. The State (PADER) does not have the resources to undertake the scope of work associated with this removal action. Newberry Township is also unable to undertake this action. Federal and State enforcement actions are not expected to result in revenues to support this removal action. The scope of work for this removal action is expected to be completed by March 30, 1989.

IV. PROPOSED ACTIONS

The requested funds will be used to continue distribution of bottled water to residences with wells with TCE concentrations up to, but not exceeding, 100 ppb. Funds will also be used to continue regular maintenance of carbon filters installed in residences with TCE concentrations exceeding 100 ppb. Regular sampling and analysis of all residential wells will be carried out using the requested funds. Bottled water will be supplied for a period of up to one year. Maintenance of carbon filters will also continue for a one year period.

The proposed continued removal actions address the protection of public health and the environment by the provision of potable drinking water to residents with contaminated groundwater. This particular scope of work does not interfere with any long-term remedial cleanup actions and will not cause conflicts with any remedial actions that may be taken at the site in the future. Any actions to provide potable water, such as bottled water and/or carbon filters, are an integral part of a total site cleanup. The OSC intends that all actions will be consistent with long-term remedial measures as far as is practical.

V. SUMMARY OF COSTS

	CURRENT CEILING	PROPOSED CEILING
(Extramural costs)		
ERCS	\$28,000	\$136,000
CONTINGENCY (15%)		16,000
TAT	17,000	84,000
ERT		9,000
SUBTOTAL EXTRAMURAL PROJECT	45,000	245,000
CONTINGENCY (15%)		37,000

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(5)

TOTAL EXTRAMURAL COSTS		275,200
(INTRAMURAL COSTS)		
EPA REGIONAL DIRECT	5,000	20,000
HEADQUARTERS DIRECT		2,000
REGIONAL INDIRECT		35,000
CRL		16,000
TOTAL PROPOSED CEILING	50,000	355,000

Anticipated Expenditures by Quarter:

4/1/88 - 6/30/88	62,500
7/1/88 - 9/30/88	62,500
10/1/88 - 12/31/88	62,500
1/1/89 - 3/31/89	62,500

VI. REGIONAL RECOMMENDATION

Because conditions at the Deardorff Drive Site meet the criteria set forth in Section 300.65 of the National Contingency Plan, and also meet the criteria in CERCLA Section 104 (A) to be exempt from the 12 Month Statutory Limit, I recommend your approval of this Additional Funding Request/Request for Exemption from the 12 Month Statutory Limit. The estimated costs are \$305,000 of which \$237,000 are for extramural cleanup contractor costs. The new project ceiling will be \$355,000.

You may indicate your approval or disapproval by signing below.

APPROVAL

DATE

DISAPPROVAL

DATE

AR200008